

ATT-VZ-42S2	<p>Refer to Verizon Initial Panel Testimony, pp. 101-102 and Exhibit IV-G-P. Verizon states that all of the UNE-P conversions will be accomplished within 27 months of a finding of non-impairment.</p> <p>(a) What plans/expectations, if any, does Verizon have for the treatment of UNE-P customers for those CLECs who currently have no collocations in central offices where such UNE-P customers are located. Please include in your answer whether Verizon's plans include the method and means by which all necessary collocation facilities can be constructed within the 27 month period within which Verizon contends it can cut over the embedded base of UNE-P customers.</p> <p>(b) What plans/expectations, if any, does Verizon have for the treatment of UNE-P customers for those CLECs who have no collocations or network facilities anywhere? Please include in your answer whether Verizon's plans include the method and means by which all necessary collocation facilities can be constructed within the 27 month period within which Verizon contends it can cut over the embedded base of UNE-P customers.</p> <p>(c) Does Verizon contend that it will be able to convert to UNE-L all customers served on UNE-P in central offices in which the provider does not have collocation within this 27 month period?</p> <p>(d) Has Verizon performed an analysis to determine to what extent it can convert to UNE-L within the 27 month period all customers served on UNE-P in central offices in which the provider does not have collocation and/or network facilities? If so, please provide all documents indicating that such an analysis was done and identify on such documents dates and other information indicating that such analysis was done prior to the response to this question.</p>
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RESPONSE:

Verizon objects to this interrogatory on the grounds that it is beyond the scope of this proceeding and not reasonably calculated to lead to the discovery of admissible evidence.

SUPPLEMENTAL RESPONSE (12/01/03):

Verizon will provide response to this interrogatory on or before December 4, 2003.

SUPPLEMENTAL RESPONSE (12/04/03):

Verizon specifically reserves its objections to this interrogatory. Subject to such objections, and in compliance with the Judge's order compelling discovery, Verizon states as follows:

- (a) To whatever extent (i) a CLEC is currently providing service to one or more customers in a particular area utilizing UNE-P; (ii) Verizon's obligation to offer mass-market local switching on an unbundled basis is eliminated in that area pursuant to the Triennial Review Order, (iii) the CLEC chooses to continue serving the customer and the customer chooses to remain with the CLEC, and (iv) the CLEC chooses to serve the customer utilizing UNE-L, rather than alternatives such as resale, it is Verizon's "plan" and "expectation" that the CLEC will work in good faith with Verizon to develop an appropriate transition plan and will place timely orders for the services and facilities that it requires, including, as appropriate in particular cases, traditional physical collocation, alternative physical collocation arrangements, virtual collocation, and EELs (where available). It is, however, the CLEC's responsibility, not Verizon's, to ensure that it determines the number of such arrangements that it will require, and that it places timely orders (given current provisioning intervals) for such arrangements. Verizon, for its part, has in place well-established procedures for the construction of the necessary collocation spaces and other facilities necessary to migrate their current UNE-P customers to UNE-L. Verizon has repeatedly demonstrated that it can satisfy its collocation obligations, and it has no doubt that it will continue to do so after the Commission determines that the TRO requirements have been satisfied in the five relevant market areas.
- (b) See Response to ATT-VZ-42 (a) above.
- (c) See Response to ATT-VZ-42(a), above. For the reasons set forth in Verizon's Initial Testimony, we do not believe that there will be any need to "convert to UNE-L all customers served on UNE-P in central offices in which the provider does not have collocation" Verizon believes that the limited number of UNE-P providers that do not already have collocation facilities and that choose to shift to UNE-L provisioning in areas in which unbundled mass-market local switching is eliminated will be able to do so if they work with Verizon to develop effective transition plans utilizing, among other things, the current process and procedures outlined above in response to ATT-VZ-42(a).
- (d) Verizon's views on this question, and the basis for those views, are set forth above. The "analysis" is a qualitative one relying on general considerations concerning the parties' obligations in relation to the ordering of service. We are aware of no relevant documents, and there is no particular point in time at which the analysis was "done." Verizon has always been aware of the general considerations set forth above.